

Federal Defenders
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David E. Patton
Executive Director

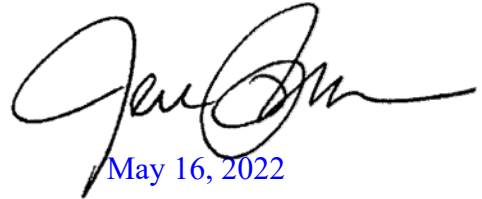
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 16, 2022

By ECF

Application GRANTED. The defendant's surrender date is hereby extended to June 15, 2022. The Clerk of Court is directed to terminate Doc. #106. SO ORDERED.

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007



May 16, 2022

Re: United States v. Christopher Ansah
19-CR-752 (JMF)

Dear Judge Furman:

With the consent of the Government, I write to request a 30-day extension of Mr. Ansah's surrender date, currently scheduled for May 19. This additional time is requested considering the drastic increase in COVID-19 cases. An extension will also give Mr. Ansah additional time to shutter and clear out his business and consult with new appellate counsel.

The United States is experiencing yet another dangerous rise in COVID-19 cases. Nationwide, COVID-19 positivity rates have increased by 60% in the last two weeks.¹ The rise has been even more alarming in the Northeast, including in Burlington County, New Jersey, where Mr. Ansah will be serving his sentence at FCI Fort Dix, located in the county. Cases have risen by **138% in the last two weeks** and hospitalizations by 52% in the last two weeks in Burlington.² Mr. Ansah's age- 59 years old- places him in the category of individuals more likely to get very sick from COVID-19 if exposed to the virus.³ His incarceration at this time, before we know more about this current wave and variant, would pose an unnecessary risk to his physical health. Allowing Mr. Ansah to remain in the community would not pose a risk of danger to the community as he has been complaint on Pretrial supervision, he has no prior convictions, and this conviction was for a non-violent offense in which Mr. Ansah was not a mastermind, leader or organizer.

An extension is also requested to permit Mr. Ansah necessary time to sort out his legal and personal affairs. Mr. Ansah is in the process of retaining appellate lawyer Randall D. Unger.

¹ <https://www.nytimes.com/interactive/2021/us/covid-cases.html>

² <https://www.nytimes.com/interactive/2021/us/burlington-new-jersey-covid-cases.html>

³ <https://www.cdc.gov/aging/covid19/covid19-older-adults.html#:~:text=Older%20adults%20are%20more%20likely,60s%2C%2070s%2C%20and%2080s.>

Mr. Unger called undersigned counsel and explained that an extension would provide him with the opportunity to meet with Mr. Ansah to assess his case prior to him being incarcerated and access becoming far more difficult. Finally, Mr. Ansah's imprisonment means the shuttering of his business, Chrimech Ventures. He is required to clear out the warehouse he used for his storage and shipping operations. To do so, Mr. Ansah plans to send the remaining items in his shop to Ghana. The process for obtaining a container has been difficult and costly, in part due to global unrest, but he should be receiving a container in the next couple of weeks and able to clear his shop and ship his items at this time.

For the aforementioned reasons, I ask that Mr. Ansah be permitted to extend his surrender date for approximately 30 days.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
212-417-8735

cc: Matthew Shahabian
Assistant United States Attorney
(by ECF)